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Federal Bureau of Prisons

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

12 KEITH H. ("MALIK") WASHINGTON,
13 *et al.*,

14 Plaintiffs,

15 v.

16 FEDERAL BUREAU OF PRISONS, *et al.*,
17 Defendants.

Case No. 21-cv-00787-JST

**STIPULATED REQUEST TO EXTEND
TRO BRIEFING SCHEDULE AND
~~PROPOSED~~ ORDER**

18 Pursuant to Civil Local Rule 6-2, Plaintiffs and Defendants respectfully request to extend the
19 briefing schedule for the Applications for the Temporary Restraining Order by four days and to extend
20 the hearing date.

21 WHEREAS, pursuant to the Court's Order, Defendants' Response is due on February 12, 2021.
22 Dkt. No. 35.

23 WHEREAS, Defendants have been working diligently on the Response to Plaintiffs'
24 Application, the supporting declarations, and the exhibits;

25 WHEREAS, Defendants need additional time to complete the materials. For instance, Defendant
26 Bureau of Prisons will need more time to review and mark the exhibits for redactions. Defendant has
27 had limited paralegal resources available, so this process will require additional time;

1 WHEREAS, the Parties have reached agreement to extend the briefing schedule and the hearing
2 date;

3 THEREFORE, Plaintiffs and Defendants respectfully request that the Court extend the schedule
4 as follows.

- 5 • Defendants' Responses: February 16, 2021;
- 6 • Plaintiffs' Replies: February 23, 2021; and
- 7 • Hearing: Week of March 9, 2021/TBD by the Court.

8
9 Respectfully submitted,

10 Dated: February 12, 2021

11 DAVID L. ANDERSON
12 United States Attorney

13 By: /s/ Christopher F. Jeu
14 Christopher F. Jeu
15 Assistant United States Attorney
Attorneys for Defendant
Federal Bureau of Prisons

16 *As the ECF User whose identification and password are being used to file this Stipulation, I attest under*
17 *penalty of perjury that Plaintiff's counsel has concurred in the filing of this document.*

18 By: /s/ Richard Tan
19 Richard Tan
20 LAW OFFICES OF RICHARD TAN

21 Attorney for Plaintiffs
22 KEITH H. WASHINGTON and
23 SAN FRANCISCO BAY VIEW NATIONAL BLACK
NEWSPAPER

24 By: /s/ Cheryl Wilke
25 Cheryl Wilke
LEWIS BRISBOIS

26 Attorney for Defendants
27 The Geo Group and Monica Hook
28

PROPOSED ORDER

The Court has reviewed the Parties' Stipulated Request to Extend the Schedule relating to Plaintiffs' Applications for the Temporary Restraining Order. Dkt. No. 37.

For good cause appearing, the Court orders as follows:

The schedule relating to Plaintiffs' Applications for a Temporary Restraining Order is extended as follows:

- Defendants' Responses: February 16, 2021;
- Plaintiffs' Replies: February 23, 2021; and
- Hearing: March 10, 2021 at 9:30 a.m.

Dated: February 12, 2021


Hon. JON S. TIGAK
United States District Judge